

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**D&T PARTNERS, LLC (successor in  
interest to ACET VENTURE  
PARTNERS, LLC),  
Directly and Derivatively on Behalf of  
ACET GLOBAL, LLC and  
BAYMARK ACET HOLDCO, LLC  
and ACET Global, LLC**

**Plaintiffs,**

**v.**

**BAYMARK PARTNERS, LP;  
BAYMARK PARTNERS  
MANAGEMENT, LLC;  
SUPER G CAPITAL, LLC;  
SG CREDIT PARTNERS, INC.;  
BAYMARK ACET HOLDCO, LLC;  
BAYMARK ACET DIRECT INVEST,  
LLC;  
BAYMARK PARTNERS;  
DAVID HOOK; TONY LUDLOW;  
MATTHEW DENEGRÉ;  
WILLIAM SZETO; MARC COLE;  
STEVEN BELLAH;  
ZHEXIAN “JANE” LIN;  
DANA MARIE TOMERLIN;  
PADASAMAI VATTANA;  
PAULA KETTER;  
VANESSA TORRES;  
WINDSPEED TRADING, LLC; and  
HALLETT & PERRIN, P.C.  
JULIE SMITH**

**Defendants**

**C.A. NO. 3:21-CV-01171-B**

**DEFENDANTS HALLETT & PERRIN, P.C. AND JULIE SMITH’S  
MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COMES NOW**, Hallett & Perrin, P.C. and Julie Smith, Defendants in the above-styled and numbered cause (“Attorney Defendants”), and move the Court to allow Edward P. Perrin, Jr., Jennifer R. Poe, Elizabeth A. Finch, and Hallett & Perrin, P.C., to withdraw as counsel for Attorney Defendants and substitute Daniel D. Tostrud, Matthew E. Last, and Michelle D. Daniel of Cobb Martinez Woodward PLLC as counsel of record for said Attorney Defendants, and in support thereof would respectfully show the Court as follows:

**I.**

Defendants Hallett & Perrin, P.C. and Julie Smith request that Edward P. Perrin, Jr., Jennifer R. Poe, Elizabeth A. Finch, and Hallett & Perrin, P.C., 1445 Ross Avenue, Suite 2400, Dallas, TX 75202, 214-953-0053, FAX: 214-922-4142, be permitted to withdraw as attorneys of record for Attorney Defendants, and that Daniel D. Tostrud, Matthew E. Last, and Michelle D. Daniel of Cobb Martinez Woodward PLLC, 1700 Pacific Avenue, Suite 3100, Dallas, Texas 75201, (214) 220-5200, fax (214) 220-5299, be designated as their counsel of record. Pursuant to Local Rule 83.12(a), Hallett & Perrin, P.C. and Julie Smith, counsel of record for the other Defendants in this case, request this substitution because they have been added as named defendants in Plaintiff’s First Amended Complaint. This substitution of counsel is not made for reasons of delay, but so that justice may be done.

**WHEREFORE, PREMISES CONSIDERED**, Defendants Hallett & Perrin, P.C. and Julie Smith move the Court for an order permitting Edward P. Perrin, Jr. Jennifer R. Poe, Elizabeth A. Finch, and Hallett & Perrin, P.C., to withdraw as counsel for Attorney Defendants and substitute Daniel D. Tostrud, Matthew E. Last, and Michelle D. Daniel of Cobb Martinez

Woodward PLLC as counsel of record for said Attorney Defendants, and for such other and further relief to which they may be justly entitled.

**Respectfully submitted,**

/s/ Edward P. Perrin, Jr.

**EDWARD P. PERRIN, JR.**

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**HALLETT & PERRIN, P.C.**

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**ATTORNEYS FOR DEFENDANTS  
HALLETT & PERRIN, P.C. AND  
JULIE SMITH.**

**AGREED:**

By: /s/ Daniel D. Tostrud

**DANIEL D. TOSTRUD**

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(214) 220-5299 (Fax)

**CERTIFICATE OF CONFERENCE**

Plaintiff is not opposed to this Motion.

/s/ Daniel D. Tostrud  
**DANIEL D. TOSTRUD**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2021, I electronically filed and served the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court.

/s/ Daniel D. Tostrud  
**DANIEL D. TOSTRUD**